



State of South Carolina
Office of the Inspector General

SENT VIA ELECTRONIC MAIL

May 20, 2020

OIG File No.: 2019-3212-I

The Honorable Wm. Weston J. Newton
House Legislative Oversight Committee, Chairman
228 Blatt Building
Columbia, South Carolina 29201

RE: Review of the Power Up 2019 Program – SC Vocational Rehabilitation Department

Dear Chairman Newton:

The purpose of this letter is to provide the results of the South Carolina Office of the Inspector General's (SIG) review of anonymous public input regarding the South Carolina Vocational Rehabilitation Department (SCVRD) as requested in your letter dated 6/21/2019.

Purpose of Review

The purpose of this review was to gather relevant information and conduct an analysis of alleged reckless spending practices by the SCVRD. Specifically, an anonymous constituent alleged the University of South Carolina (USC) received \$2 million from the SCVRD to create and administer a pre-employment transition service program for 150 participants in a summer workshop series identified as the Power Up 2019 Program. It was further alleged the SCVRD engaged in reckless spending practices to meet the pre-employment transition spending requirements of the Workforce Innovation Opportunity Act of 2014. The constituent also alleged the program costs were unreasonable, and the services provided were offered at local SCVRD offices at a much lesser cost.

The SIG's scope of the review was to determine the answers to the following constituent concerns:

1. Was the cost of the Power Up 2019 Program, which totaled more than \$2 million, reasonable?
2. What was the procurement process for the selection of the USC as the program contractor?
3. Were the services provided to the participants by the Power Up 2019 Program already provided at local SCVRD offices and facilities at a lesser cost?
4. What was the benefit to the participants who attended the Power Up 2019 Program?

Executive Summary

The SIG conducted an analysis of relevant documentation provided by the SCVRD and the USC, including the Power Up 2019 Program budgets, curriculum, schedules, evaluations, and final report. The SIG also reviewed interagency agreements between the SCVRD and the USC. In addition, the SIG interviewed current and former employees of the SCVRD and current employees and subject matter experts from the USC's Center for Children and Families (CCFS) and the USC Conference Center (Conference Center). The SIG reviewed emails from the SCVRD, the CCFS, and the Conference Center regarding the Power Up 2019 Program. The SIG also consulted with the State Fiscal Accountability Authority (SFAA), Procurement Services Division (PSD) for guidance regarding state procurement matters.

Background of the Power Up 2019 Program

The Power Up 2019 Program was conducted under the requirements of, and exclusive funding provided through, the federal Workforce Innovation and Opportunity Act of 2014 (WIOA). The WIOA combined rehabilitation programs with other federally supported job-training programs in block grants to the states. The WIOA's intent was to make available a variety of job training programs along with vocational rehabilitation programs to individuals with disabilities. The WIOA required vocational rehabilitation agencies to expend 15% of their total federal funds on pre-employment transition services (Pre-ETS). These services are designed to prepare individuals for employment who are still enrolled in school. Approximately \$1.9 million, or 86% of the Power Up 2019 Program cost, qualified as Pre-ETS and satisfied a portion of the SCVRD's 15% spending requirement. The SCVRD's 15% annual Pre-ETS spending requirement was \$7.95 million, based on its \$53 million total federal funds for fiscal year 2019.

Constituent Allegations and SIG Analysis

Question #1: *Was the cost of the Power Up 2019 Program, which totaled more than \$2 million, reasonable?*

The SCVRD conceived the idea for the Power Up 2019 Program in February 2019 and contacted the CCFS about developing it during the same month. The SCVRD approached CCFS based on previous work performed by the CCFS for the SCVRD and the agency's knowledge of CCFS' mission. The CCFS staff advised the SCVRD sought a reusable, "world-class" pilot program to assist their students with disabilities. The CCFS works with local, state, and national entities to improve the well-being of vulnerable adults, children, families, and communities through designing solutions and developing and conducting training. The CCFS previously assisted several state agencies including the Office on Aging, the School for the Deaf and Blind, and has done extensive work for the Department of Social Services. (<https://ccfs.sc.edu/>)

The SCVRD requested the CCFS to develop a curriculum for training disabled SCVRD students which met the Pre-ETS requirements of the WIOA and in which the SCVRD would retain exclusive ownership. The SCVRD and the CCFS entered into an interagency agreement on 5/17/2019 that called for the CCFS to provide the curriculum and trainers for a series of three summer workshops on the USC Columbia campus. Each workshop lasted four days with the participants spending three nights on the Columbia campus. The CCFS provided 25 learning modules within the following five Pre-ETS topic areas:

- job exploration counseling,
- self-advocacy training,
- postsecondary enrollment opportunities counseling,
- work-based learning services, and
- workplace readiness training.

The CCFS incorporated assessments of the knowledge and skills gained by the participants and provided learning modules for school-based rehabilitation counselors to use during the school year to reinforce the participants' skills. In addition, the CCFS collaborated with the SCVRD staff to create materials and activities for use by SCVRD counselors in working with the participants during the school year, as well as other SCVRD students.

The CCFS chose iPads as the tool for use throughout the workshops and afterward for the SCVRD counselors to access the training materials. The CCFS configured and customized the iPads to accommodate the participants and trained them in their use. Information technology support was provided during the workshops, and the SCVRD retained ownership of the iPads.

The total cost of the CCFS agreement was \$442,613, and the SCVRD received a detailed breakdown of the cost that included the titles of all CCFS staff members involved in the project, along with their salaries and percentages of time devoted to the project. The CCFS advised the turn-around time on the project was very short with contract approval on 5/17/2019 and the first workshop beginning on 6/22/2019.

The SCVRD desired for the workshops to be a turnkey operation with the USC providing all services and supplies, including advertising and selecting participants. The SCVRD contacted the USC's University Housing to provide accommodations, meals, venues, and all required logistics for the workshops. The SCVRD entered into an interagency agreement with the Conference Center, a department within University Housing, on 5/8/2019 for all services and supplies for the workshops at a total cost of \$1,738,805.

The workshop schedule included training and other activities between 7:00 a.m. and 11:00 p.m. in several locations on the USC campus, as well as businesses in the Columbia area. The workshop participants had both mental and physical disabilities and ranged in age from 13 to 21. It was expected that some of the participants had never been away from home overnight, and 90% spent their first nights away from home.

The SCVRD advised certain staffing and services provided by the Conference Center were required under the USC's license from the Department of Disabilities and Special Needs (DDSN) for workshops and other camps for individuals with disabilities.¹ The DDSN licensure standards required certain staff-to-participant ratios, as well as health and safety, facility, and transportation requirements. In addition, the USC complied with the American Camp Association standards for all of their camps. Those standards included mandatory minimum experience requirements for supervisory staff working with special needs populations.²

¹ <https://ddsn.sc.gov/about-us/divisions/quality-management/licensing-and-certification> (SC Code Sec. 44-20-710)

² https://www.acacamps.org/sites/default/files/page_documents/accreditation/Standards-at-a-glance-%28for%202019%29.pdf (see ST.5 and ST.6).

The Conference Center Cost

The SIG reviewed a breakdown of the \$1,738,805 of Conference Center cost provided by the SCVRD. The SIG observed the one-page, high-level budget summary lacked detail on the majority of the costs. The SCVRD advised the one-page budget summary was the only cost breakdown it received from the Conference Center, as illustrated below.

South Carolina Business Academy for Students with Disabilities 2019

Based on three (3): 4-day, 3 night Workshops						
<ul style="list-style-type: none"> • Session 1 – Saturday, June 22 – Tuesday, June 25, 2019 • Session 2 – Saturday, July 6 – Tuesday, July 9, 2019 • Session 3 – Saturday, July 27 – Tuesday, July 30, 2019 						
Personnel	#	Base Rate	Fringe	Effort		Proposed Amount
<i>Direct Service Personnel</i>						
On-Site Coordinator	1	\$35,000.00	0.33	25%	\$ 11,637.50	
Senior Training Manager	1	\$39,500.00	0.25	25%	\$ 12,343.75	
Residential Coordinator	1	\$38,000.00	0.33	30%	\$ 15,162.00	
Counselors	16	\$ 6,000.00	0.33	100%	\$127,680.00	
<i>Subtotal</i>						\$ 166,823.25
<i>Administrative Personnel</i>						
Administrative Director - PI	1	\$70,000.00	0.33	50%	\$ 46,550.00	
Conference Coordinator	1	\$45,000.00	0.33	50%	\$ 29,925.00	
Fiscal Coordinator	1	\$45,600.00	0.33	25%	\$ 15,162.00	
<i>Subtotal</i>						\$ 91,637.00
Total Personnel						\$ 258,460.25
Contracted Services						
▪Direct Services and Educational Supplies To Students at Workshop						\$ 1,073,908.45
▪Housing						\$ 127,183.10
▪All Inclusive Venues						\$ 240,203.00
▪Technical Services						\$ 39,050.00
Total Contracted Services						\$ 1,480,344.55
Total						\$ 1,738,804.80
Summary						
Direct Costs (Director Service to Students/Curriculum)						\$ 1,519,984.70
Administrative Costs (Personnel & Housing)						\$ 218,820.10
Total						\$ 1,738,804.80

The SIG requested a detailed breakdown of the Conference Center cost and ultimately obtained the Conference Center’s original March 2019 budget spreadsheet. The following table summarizes the items and related costs included in that original budget.

Summary of USC Conference Center Original March 2019 Budget	
Items	Items Total Cost
Administrative Staff: 1 Director, 2 Coordinators, 1 Training Manager, 1 Logistics Coordinator, 1 Fiscal Coordinator	\$ 131,113
Contracted Staff: 1 Registered Nurse (RN), 2 Licensed Practical Nurses (LPN's), 3 Certified Personal Care Assistants, 16 Counselors, 4 Interpreters, 1 Maintenance Worker – all 24 hours per day	376,720
Transportation Services*: 4 ADA buses with drivers -10 hours/day for 6 days; 2 ADA buses with drivers - 10 hours/day for 6days; parking fees for staff for 17 days	100,950
ADA Compliant Rooms: For participants and contracted staff - 53 rooms for participants and personal care staff for 12 nights; 17 rooms for counselors and nurses for 17 nights	94,926
Meals: Includes meals for staff over 5 days and meals for participants and staff at various venues on and around the USC campus over the 12 days of the workshops	110,748
Housing Essentials: Extensive list of items which included book bags, beach towels, sunglasses, shower shoes, hydration bottles, shower baskets with toiletries, ID cards with \$50 Carolina cash, shirts for participants/staff, business-wear jackets/cardigans for participants, and iPad cases	303,133
iPads	209,373
Insurance - supplemental accident insurance covering participants	10,246
Health Care Services - for participants and staff	44,022
Participant Selection Process - application processing and mailings	25,000
Videos - of training and related functions/photos for participants and parents	200,000
On-site IT - for software, programming of iPads, and support	26,550
USC Venue Rentals - classrooms, the Sonoco Room, Hootie Auditorium, and the Longstreet Auditorium	82,467
Opening/Ending Event Charges	19,800
TOTAL COST	\$ 1,735,048
<i>*Note-the total cost was subsequently increased due to the addition of a golf cart rental of \$3,757.04.</i>	

SIG Analysis of the Power Up 2019 Program Cost

The SIG determined the CCFS budget for the development of the curriculum and training provided sufficient detail, which enabled the SIG to conclude the cost was reasonable and appropriate. The numbers of staff assigned to the project, their salaries, and the percentages of time devoted to the project were deemed as reasonable, particularly given the quick turn-around time required by the SCVRD. A review of the CCFS projects for other state agencies found the total Power Up 2019 Program cost was consistent with other projects.

The Conference Center’s original March 2019 budget spreadsheet enabled the SIG to conclude that certain charges were reasonable where others were excessive. The SCVRD only received a high-level budget summary with no detailed breakdown of the cost. The SCVRD staff advised

they were not aware of any negotiations concerning the Conference Center’s cost, and without any detailed cost, no negotiations would have been possible.

Neither the SCVRD nor the Conference Center had experience with a program like the Power Up 2019 Program, which involved vulnerable individuals with various disabilities and age range, many of whom would be spending days and nights away from home for the first time. Based on the extensive staffing and services provided, the SCVRD and the Conference Center planned for any eventuality, around the clock.

Transportation, room and board costs were reasonable and consistent with published prices. The video cost was comprised of the USC in-house marketing department charges and charges by videographer. The video cost was reasonable given the services provided, which included videos of all training sessions, post-workshop interviews, and still photographs of all participants.

Conference Center’s Application of the “2.53 Factor”

The SIG’s analysis of the Conference Center’s detailed budget spreadsheet revealed an adjustment that substantially increased costs to certain items. The adjustment, identified as the “2.53” factor increased items by 253%. The Conference Center applied the 2.53 factor to 19 items that added \$271,509 to the budget. The following table illustrates the Conference Center’s application of the 2.53 factor by item:

USC Conference Center - Application of the "2.53 Factor"				
Items	Individual Item Cost	Extended Total	After 2.53 Factor Applied	Amount Added
Rooms-ADA Adjustment	\$15/room/night	2,250.00	5,692.50	3,442.50
Participants' Rooms	\$30/room/night	13,500.00	34,155.00	20,655.00
Nurses' Rooms	\$35/room/night	1,785.00	4,516.05	2,731.05
Pers. Care Asst. Rooms	\$35/room/night	945.00	2,390.85	1,445.85
Counselors' Rooms	\$70/room/night	19,040.00	48,171.20	29,131.20
Wellness Center Access	\$25/person	21,600.00	54,648.00	33,048.00
Participants' Shirts	\$35/each	23,100.00	58,443.00	35,343.00
Staff Shirts	\$40/each	23,040.00	58,291.20	35,251.20
Business Attire	\$100/each	16,500.00	41,745.00	25,245.00
iPad Chest E-Holder	\$45/each	675.00	1,707.75	1,032.75
iPad Cases	\$30/each	4,050.00	10,246.50	6,196.50
Styluses	\$15/each	2,475.00	6,261.75	3,786.75
Book Bags	\$50/each	9,000.00	22,770.00	13,770.00
Beach Towels	\$25/each	4,500.00	11,385.00	6,885.00
Sunglasses	\$25/each	4,500.00	11,385.00	6,885.00
Insurance-Liability	\$50/person	4,050.00	10,246.50	6,196.50
Health Services	\$25/person	17,400.00	44,022.00	26,622.00
Longstreet Theater Rental	\$1,300/use	3,900.00	9,867.00	5,967.00
IT Programming	\$50/hour	6,300.00	14,175.00	7,875.00
TOTAL ADDED COST				271,509.30

The Conference Center staff stated the 2.53 factor “was applied to variable costs to reflect anticipated overhead, rate changes, risk management costs, and other one-time charges.” The SIG asked the Conference Center staff if it was common practice to utilize the 2.53 factor in pricing events. A department administrator responded:

“The Proposed 3/10/2019 budget was calculated as presented. After 40 years of calculating conference budgets, the formula we use is 2.5 – 3.0 for new conferences that do not have specific formats and/or conference that require specific skill sets; 1.5 – 2.4 for new conferences that have a structured itinerary with detailed specs; .6 - 1.4 for returning conferences that do not have specific formats, and 1 - .6 for returning conferences for cost of living increases.”

Justification for the use of the largest factor was based on the Power Up 2019 Program being a “new conference” without “specific formats” was not consistent with the workshops’ detailed curriculum and schedule. In addition, the workshops required specific skill sets provided through extensive 24/7 staffing of medical personnel, personal care assistants, interpreters, and crisis counselors, as well as, the ratio of counselors to participants, the availability of disability transportation, the housing essentials, and the provision of medical services.

Power Up 2020 Program

During the review, the SIG determined the SCVRD was evaluating a proposal from the USC to host the same program in 2020. The SIG reviewed the Conference Center’s proposed 2020 budget and determined the proposed budget was substantially lower than the Power Up 2019 Program cost even though the number of workshops, workshop duration, and number of participants were the same as the 2019 program.

The cost of most items was reduced from 2019 resulting in an overall reduction of \$780,531, from \$1,738,805 to \$958,274. Outside of the reduction of the venue and transportation costs due to consolidating activities in the Top of Carolina facility and the reuse of the iPads, the majority of the savings resulted from the elimination of numerous Power Up 2019 Program items, such as the number of housing essentials was reduced from 14 items to four.

The following table compares the 2019 cost to the proposed 2020 cost:

Comparison of Power Up 2019 Cost to 2020 Proposed Cost			
Items	Power Up 2019 Cost	Power Up 2020 Proposed Cost	Amount of Reduction or (Increase)
Personnel	507,832.75	476,078.75	31,754.00
Transportation*	104,707.04	30,000.00	74,707.04
Housing	94,925.60	59,094.91	35,830.69
Meals	110,747.91	101,160.00	9,587.91
Housing Essentials	303,133.20	22,386.75	280,746.45
iPads	209,373.00	-	209,373.00
CEUs	-	4,750.00	(4,750.00)
Insurance	10,246.50	7,500.00	2,746.50
Health Services	44,022.00	4,554.00	39,468.00
App. Process/Mailings	25,000.00	25,000.00	-
Videos	200,000.00	125,000.00	75,000.00
Venues	82,467.00	36,750.00	45,717.00
On-site IT	26,550.00	60,000.00	(33,450.00)
Opening/Closing Event	19,800.00	-	19,800.00
Conclusion	-	6,000.00	(6,000.00)
TOTALS	1,738,805.00	958,274.41	780,530.59

**Note-transportation differs from the original budget due to the addition of a golf cart rental.*

Question #2: *What was the procurement process for the selection of the USC as the program contractor?*

The SCVRD staff advised they reviewed other programs around the country, but could not find any that offered all five required activities under the Pre-ETS regulations. In addition, the programs the SCVRD reviewed were disability-specific or catered to specific age ranges, and very few had access to 24-hour medical care for the participants.

The SCVRD staff advised no private facilities were contacted to host the Power Up 2019 Program. The SCVRD staff also advised they contacted USC-Upstate, USC- Beaufort, and Coastal Carolina University, but none could accommodate the program. They noted the USC-Columbia campus provided more exposure and opportunities for students than smaller communities, and the USC’s central location in the state benefitted families travelling from all parts of the state.

After the decision to utilize the USC for both the curriculum development and to carry out the program, the SCVRD sought approval from the SFAA/PSD to enter into intergovernmental agreements³ with the USC. The state’s Consolidated Procurement Code allows state agencies to enter into intergovernmental agreements with one agency providing services and supplies to the procuring agency without requiring competitive bids or proposals in a public procurement

³ See SC Code §11-35-710; 11-35-4830, 4840, 4900

process. The SCVRD received approval to enter into both the CCFS and the Conference Center agreements from the PSD prior to executing agreements with the USC.

Question #3: *Were the services provided to the participants at the Power Up 2019 Program already provided at SCVRD local offices and facilities at a much lesser cost?*

The SCVRD provides the five Pre-ETS topic areas to their students at all of its local offices and facilities, but not all five services at the same time at all of their local offices and facilities are provided. The Power Up 2019 Program included 25 modules that incorporated all five Pre-ETS services in a “scholar camp” setting with an emphasis on providing participants the opportunity to engage with peers, trainers, and business professionals. The modules were designed to expose the participants to various curricula and Pre-ETS programs during the four days of the camp with activities scheduled from 7:00 a.m. to 10:45 p.m.

Sixteen departments at the USC were involved with the program. The City of Columbia, Colonial Life, Barnes and Noble, and the USC College of Nursing participated by providing job applications and position descriptions for the participants. Able South Carolina, a nonprofit organization, provided group instructional lessons on self-advocacy, self-awareness, financial literacy, and job attainment skills. CarolinaLIFE, an individualized, non-degree program at the USC College of Education, brought students in to speak about college life, independent living, and personal development.

The SCVRD staff advised the Power Up 2019 Program would be repeated in the summer of 2020. Changes to the program, based on feedback, evaluations, and observations, included conducting two workshops in the same format as 2019 and a revised third workshop titled “Level Up 2020.” The Level Up 2020 workshop plans to include participants who attended the Power Up 2019 Program, along with enhanced and in-depth Pre-ETS instruction.

The SIG found that Pre-ETS provided at local SCVRD offices did not provide the level of service, intensity of engagement, and unique learning opportunities as provided by the Power Up 2019 Program.

Question #4: *What was the benefit to the participants who attended the Power Up 2019 Program?*

According to the SCVRD staff, the Power Up 2019 Program is unique and there are no other comparable Pre-ETS programs in the United States. The program prepares the participants to obtain employment by incorporating the five Pre-ETS standards, with an emphasis on self-reliance.

The SCVRD and CCFS staff engaged industry partners and business leaders to participate in the program. The participants received business cards and interacted with business leaders from the community, allowing the participants to learn to advocate for themselves. In addition, program participation allowed participants the experience of living away from home, attending technical fairs, and interacting with employers in job interviews.

The CCFS developed an evaluation of the Power Up 2019 Program for participant feedback. In addition, five online surveys evaluated satisfaction, usefulness, importance, and impact of the

program from the student's perspective. The CCFS reported that 88% of the comments received from the participants were positive. Topics that generated positive feedback included social interactions, staff and counselors, training and learning activities and social activities.

As part of the curriculum development, the CCFS provided an assessment tool to determine the learning and skills attained by the participants. In addition, follow up materials were provided for school-based rehabilitation counselors to reinforce the participants' learning from the program during the school year. Materials were also provided to the SCVRD staff to work with the participants and as other SCVRD students.

Participants received a certificate of attendance and continuing education unit credits from the USC Continuing Education Office for their participation. Two of the participants obtained employment at the conclusion of the program, with one being hired by the USC. A SCVRD staff member remarked, "*Students left different than when they came.*"

The Power Up 2019 Program provided participants the opportunity to live with and engage with others with similar disabilities. The SCVRD staff stated the program provided participants with unique opportunities and one-on-one interaction with staff and trainers that they could not receive at their local offices. The SIG viewed video testimonials from participants and their families, who discussed the positive impact the program provided regarding their disabilities. The SIG's review concluded this program was beneficial for those who attended and provided greater focus and Pre-ETS services for eligible students.

Summary and Conclusion

The SCVRD sought to create a "world class" pilot program to assist students with disabilities, and was successful in doing so. The program undoubtedly delivered significant benefit to those students who attended, far beyond the benefits provided at SCVRD offices, due to the intensity and extent of the training and experiences provided. The SCVRD made a reasonable choice in collaborating with the USC, at least for the initial offering of the pilot program, due to the USC's central location and available resources on its Columbia campus. The CCFS had the knowledge, capacity, and experience to create the program on short notice, and the Conference Center had the ability to marshal the necessary resources to facilitate the program. The SCVRD followed the appropriate procurement guidelines and approvals to enter into intergovernmental agreements with both the CCFS and the Conference Center.

The SCVRD acknowledged the majority of the Power Up 2019 Program cost met a portion of the agency's WIOA Pre-ETS spending requirement. However, the SCVRD staff stated that was not the purpose of creating the program; rather, it was the development of a pilot Pre-ETS program adaptable for use in multiple locations throughout the state. The SCVRD staff stated there was no pre-determined budget in advance of approaching the USC and did not provide the USC with a budget amount.

While the students who participated benefitted, the number of students who benefitted from the program was relatively small and the cost was substantial - \$11,600 per student. The SIG's cost analysis found the CCFS curriculum cost was reasonable but certain Conference Center costs were excessive. The "2.53 factor" added \$271,509 and while the Power Up 2019 Program was a

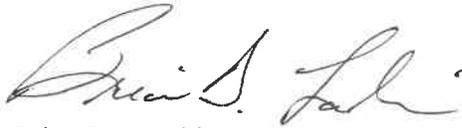
new conference it had a detailed schedule along with the extensive provision of supplies and around-the-clock services.

The tentative cost reduction of \$780,531 in the proposed Power Up 2020 Program budget indicates many 2019 items may have been unnecessary. The change in venues and the reuse of the iPads generated some of the savings, but the majority (at least \$460,620) were items eliminated in the proposed 2020 budget. The SCVRD staff stated they were not aware of any negotiations over cost with the USC, and they did not possess a detailed cost breakdown upon which to base negotiations.

Going forward, the SCVRD must continue to evaluate the program's cost and strive to make it more economical as it delivers the program in multiple venues. While doing so, the SCVRD must weigh the cost per participant against program outcomes, as measured by the success rate of the participants attaining employment.

In closing, the SIG extends its gratitude to Commissioner Johnson and the SCVRD staff, as well as the USC CCFS and Conference Center staff for the assistance provided to the SIG during this review. The SIG is available to answer any questions you may have or provide a more detailed briefing to the committee members in this matter.

Sincerely,



Brian D. Lamkin
Inspector General

Cc: Felicia W. Johnson, Commissioner, South Carolina Vocational Rehabilitation Department
Terry Parham, General Counsel, University of South Carolina